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15 CHURCH OF SCIENTOLOGY OF CALIFORNIA

16 SUPERIOR COURT OF THE STATE OF CALIFORNIA
17 FOR THE COUNTY OF LOS ANGELES

18 CHURCH OF SCIENTOLOGY OF)	No. C 420 153
19 CALIFORNIA, a California)	
20 Corporation,)	OBJECTION OF CROSS-DEFENDANT
)	21 CHURCH OF SCIENTOLOGY OF
22 Plaintiff,)	23 CALIFORNIA TO RELEASE OF
)	24 PRECLEAR FILES
v.)	
)	25 [UNDER SEAL]
26 GERALD ARMSTRONG, et al.,)	
)	
27 Defendants.)	
)	
28)	
29 AND RELATED CROSS-ACTION		

30 I.

31 INTRODUCTION

32 The Church has fought, at all times herein, to protect
33 Armstrong's privacy, and the privacy of its other
34 parishioners, by refusing to produce the preclear files
35 relating to Armstrong for an in camera inspection.
36 Needless to say, the Church does not wish to jeopardize its
37 ability to provide religious services to all of its
38

1 adherents simply because one ex-member lacks respect for its
2 religious principles. The Church urges this Court to consider
3 carefully, as several other courts have done, the potential
4 adverse impact on religious confidentiality for all Church
5 members which arises from Armstrong's own attempts at
6 self-destruction through insisting that his preclear files
7 become discoverable.

8 Throughout this litigation, the Church has maintained
9 these files securely and in confidence, and only within the
10 last few weeks have these files been copied, indexed and
11 reviewed by counsel in preparation for their production as
12 ordered by this Court. As is evident below, the Church has
13 very obviously not utilized or disseminated the information
14 contained in these files at any point. As is also evident
15 below, there is significant information contained in these
16 files which is directly contradictory and otherwise quite
17 detrimental to Armstrong's assertions in support of his case.
18 Additionally, there is a great deal of information contained
19 in the files which is undoubtedly personally embarrassing to
20 Mr. Armstrong and extremely destructive to his reputation and
21 credibility. Nonetheless, even in full awareness of the
22 damage that the contents of these files could inflict upon
23 Armstrong and his claims, the Church still urges this Court to
24 maintain the privacy of the documents and the information
25 contained therein. This position is not based upon any
26 overriding concern for Armstrong's welfare; rather, the Church
27 still maintains that the sanctity of the confessional must be
28 placed above all other concerns.

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II.

APPROPRIATE ALTERNATIVES AVAILABLE TO THIS COURT

In Wollersheim v. Church of Scientology of California.

et al., Los Angeles Superior Court No. C 332 027, the Honorable Ronald Swearinger was faced with a similar, although possibly even more serious, situation. In that case, plaintiff Larry Wollersheim had alleged that the pastoral counseling delivered to him by the Church had directly resulted in physical and emotional damage to him. He further alleged that the preclear files pertaining to him were directly relevant as evidence of this damage, and the intentional or negligent infliction emotional distress to him.

As in the case herein, the production of the preclear files relating to Larry Wollersheim occurred in stages, with the Church bringing to the Court's attention at each stage the relevant objections. On February 28, 1986, Judge Swearinger required plaintiff Wollersheim to inform the Court that a knowing and informed waiver of the priest-penitent privilege was being made. (See Declaration of John G. Peterson, attached hereto as Exhibit "A".)

On March 13, 1986, Judge Swearinger took note of the November 5, 1985 Order issued by the Honorable Judge Mariana Pfaelzer in the case of Religious Technology Center, et al. v. Larry Wollersheim, et al., U.S.D.C. C.D.Ca. Civil Action No. 85-7197-MRP. That Order described as "confidential religious scriptures" the materials known within the Church as "(1) Solo Part II, (2) Power, (3) R6EW, (4) DCSI, (5) Sunshine

1 Rundown, (6) Clearing Course, (7) OT I, (8) OT II, (9) OT III,
2 . . ." (See Temporary Restraining Order, attached hereto as
3 Exhibit "B".) Following the decision reached by Judge
4 Pfaelzer, Judge Swearinger ordered that "[w]e are not going
5 into the contents of those upper level materials." (See March
6 13, 1986 Trial Transcript, pp. 2208-2209, attached hereto as
7 Exhibit "C".) Judge Swearinger reiterated on April 3, 1986
8 that no testimony from the upper levels materials, being
9 defined as "Power through NOTS", would be allowed into the
10 trial of the action. (See April 3, 1986 Trial Transcript, pp.
11 4786-4787, attached hereto as Exhibit "D".) Thereafter, the
12 preclear files were produced to Judge Swearinger for his in
13 camera inspection. The files containing upper level
14 materials were not required to be produced, and were not
15 produced.

16 On May 6, 1986, after Judge Swearinger had thoroughly
17 reviewed the contents of the files, a discussion was held
18 concerning the "tremendous confusion and side shows" that the
19 introduction of the preclear files into the Wollersheim case
20 would create. (See May 6, 1986 Trial Transcript, p. 7571,
21 attached hereto as Exhibit "E".)

22 A procedure whereby the files were maintained by the
23 Court, but in which Wollersheim and his counsel could review
24 them in the presence of a referee, was established. No such
25 review occurred, apparently due to a decision by Wollersheim
26 and his counsel that the interests balanced by the information
27 contained in those files becoming public or staying private
28 came down on the side of privacy.

1 The alternative suggested by the Wollersheim case is
2 completely applicable and appropriate to the case herein. The
3 Church has not produced the three files pertaining to
4 Armstrong which contain "confidential religious scriptures".
5 Those files, covering the time period from just a portion of
6 1978 into early 1980, include "(1) Solo Part II, . . . (6)
7 Clearing Course, (7) OT I, (8) OT II, [and] (9) OT III"
8 materials. It has, however, produced for inspection the
9 twenty-five files covering the time period from Armstrong's
10 first pastoral counseling, in 1970, up through the portion of
11 1978 when he engaged in the confidential upper level
12 counseling. This Court should require only the production of
13 the preclear files already produced.

14 This Court should also, as was established by the
15 Wollersheim court, require Armstrong and his counsel to
16 provide a waiver of the priest-penitent privilege prior to any
17 review of the files which have been produced. The procedure
18 formulated by Judge Swearinger, which would allow Armstrong and
19 his counsel to review the files in the presence of a referee,
20 is likewise completely appropriate for the case herein. Upon
21 completion of his review, this Court should require Armstrong
22 to specifically state which documents support his claims. The
23 Church is confident that Armstrong will be unable to
24 demonstrate any support for his claims that Armstrong's
25 files were "culled" for the simple reason that no such action
26 has occurred.

27 It seems highly unlikely that Armstrong and his counsel,
28 once they have reviewed these files, will still insist on

1 making their contents a part of this case as such an action
2 will create only harm to Armstrong. The Church has not
3 utilized these files in any way for this litigation, and
4 repeats its offer at this time to destroy the files, and any
5 copies thereof, in Armstrong and/or his counsel's presence
6 should they now be willing to adopt this course of action.



7 III.

8 INFORMATION IN THE PRECLEAR FILES IS HARMFUL
9 TO ARMSTRONG'S CASE AND CHARACTER

10 If Armstrong insists on making the contents of these
11 files a part of this case by obtaining copies of them, and if
12 the Court does not reconsider its intention to release these
13 preclear files to Armstrong, the Church will be forced,
14 against its wishes, to utilize the same documentation in its
15 defense as evidence of Armstrong's character and perjurious
16 statements.

17 A. Statements Regarding Armstrong's Case

18 The files contain numerous references to admissions by
19 Armstrong which are directly contradictory to his allegations
20 in the Third Amended Cross-Complaint as well as
21 representations made directly to this Court in various
22 declarations. Information in this regard includes the
23 following:

24 1. On November 18, 1977, Armstrong commented to his
25 minister 
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[REDACTED]

. On February 26, 1977, Armstrong informed his minister [REDACTED]

. On November 13, 1976, Armstrong stated that [REDACTED]

[REDACTED]

2. On October 24, 1977, Armstrong informed his minister that [REDACTED]

3. On October 16, 1977, Armstrong informed his minister that [REDACTED]

[REDACTED]

4. On September 20, 1977, Armstrong informed his minister that [REDACTED]

5. On September 2, 1977, Armstrong confessed to his minister that [REDACTED]

6. On May 5, 1977, Armstrong informed his minister that, [REDACTED]

7. On February 27, 1977, Armstrong informed his minister that [REDACTED]

1 8. On February 26, 1977, Armstrong described the
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7 All of the above statements by Armstrong are highly
8 relevant to this action. They lead to the inescapable
9 conclusion that Armstrong has lied to this Court and, when
10 that ultimately proves to be the case, contempt and dismissal
11 of the action is the proper sanction.

12 B. Statements Regarding Armstrong's Character

13 Other admissions contained in these files, which go
14 directly to Armstrong's credibility and character, include the
15 following:

16 1. Armstrong admitted to his ministers on numerous
17 occasions that

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20 (see, e.g., March 26, 1970 and July 16, 1970
21 statements); (see, e.g., statement of April 17,
22 1970); (see, e.g., statements of December
23 31, 1972 and July 20, 1973); (see,
24 e.g., June 30, 1977 statement).

25
26 2. Armstrong admitted to his ministers on numerous
27 occasions that
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1 [REDACTED]
2 [REDACTED]
3 (see, e.g., statements of July 18, 1974 and September 6, 1977);
4 [REDACTED]
5 [REDACTED] (see, e.g., statements of May 23, 1970,
6 July 18, 1974 and February 27, 1977); [REDACTED]
7 [REDACTED] (see, e.g., statement of May 23, 1970);
8 [REDACTED] (September
9 24, 1976); [REDACTED] (see,
10 e.g., statement of December 8, 1976); [REDACTED]
11 [REDACTED] (see, e.g.,
12 statements of April 14, 1970, February 6, 1971 and August 12,
13 1977); [REDACTED]
14 [REDACTED] (September 6, 1977); [REDACTED]
15 [REDACTED] (see, e.g.,
16 statements of September 15, 1971 and February 26, 1972).

17 3. Armstrong admitted to his ministers that [REDACTED]

18 [REDACTED] (See, e.g., statement of July 25, 1973.)

19 4. Armstrong admitted to his auditors on numerous
20 occasions that [REDACTED]
21 [REDACTED]
22 [REDACTED]

23 [REDACTED] (See, e.g., statements of February 6, 1971;
24 February 15, 1971; September 15, 1971; and October 10, 1972.)

25 The above admissions, if the Church is ever forced to use
26 them, must be construed as admissions against Armstrong's
27 interest. They paint an incredibly sad picture of a pathetic
28 and troubled individual who engaged in one illegal or deviant

1 act after another until entering the Church; who continued,
2 although in a comparatively minor way, to practice his debased
3 activities while a member of the Church; and who immediately
4 resumed his extremely aberrated activities upon leaving the
5 Church as demonstrated by his theft of thousands of pages of
6 personal materials and his "talking pig" essay, a sickening
7 "personal creative work" authored by Armstrong for potential
8 publication. (See essay, attached hereto as Exhibit "F".)

9 IV.

10 THE DOCUMENT DATED NOVEMBER 26, 1976,

11 MARKED BY THE COURT AS SEALED EXHIBIT NO. 600,

12 IS NOT REPRESENTATIVE OF THE PRECLEAR FOLDERS

13 The document selected by the Court and denoted as sealed
14 Exhibit No. 600 in its Order of June 26, 1986 is not
15 representative of the majority of the documents contained in
16 the preclear files pertaining to Armstrong. The majority of
17 the documents contained in these preclear files are notes
18 taken by the ministers who delivered specific pastoral
19 counseling processes to Armstrong. Their notes, as
20 demonstrated above, reflect a great deal of spiritual
21 reflection and unburdening by Armstrong. The document
22 selected by this Court, however, is simply a review of an
23 earlier pastoral counseling process delivered to Armstrong;
24 its purpose was only to prepare Armstrong for additional
25 pastoral counseling processes.

26 Therefore, if the Court determines to release these files
27 to Armstrong, the Church proposes the addition of several
28 additional sealed exhibits as more truly being representative

1 of the documents contained within these preclear files. The
2 documents dated March 26, 1970, May 23, 1970, July 18, 1974,
3 and February 22, 1977 are hereby requested for introduction as
4 sealed Exhibits No. 601, 602, 603, and 604.

5 V.

6 FURTHER COMPLIANCE WITH THE COURT'S ORDER

7 OF JULY 2, 1985

8 Pursuant to this Court's Order of July 2, 1985, attached
9 hereto as Exhibit "G" is a list of each of the pastoral
10 counseling sessions contained within the preclear files by
11 date, the name of the minister who counseled Armstrong, and
12 the location where the counseling occurred when known.

13 VI.

14 CONCLUSION

15 For the reasons set forth hereinabove, the Church urges
16 this Court to allow Armstrong access to the preclear files for
17 inspection without copying or the taking of notes only. Such
18 an alternative will meet Armstrong's discovery objectives and
19 yet maintain the integrity of the confessional files without
20 interjecting their contents into this litigation. The Church
21 further urges this Court to require a waiver of the priest-
22 penitent privilege from Armstrong and his counsel prior to any
23 such inspection, to require a written statement specifying

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1 what documents support his claims, and to exclude any
2 production of the "confidential religious scriptures".

3 DATED: July 3, 1986

Respectfully submitted,

4 OVERLAND, BERKE, WESLEY, GITS,
5 RANDOLPH & LEVANAS

6 By:

7 DONALD C. RANDOLPH

8 Attorneys for Plaintiff and
9 Cross-Defendant Church of
10 Scientology of California

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16 SUPERIOR COURT OF THE STATE OF CALIFORNIA

17 FOR THE COUNTY OF LOS ANGELES

18 CHURCH OF SCIENTOLOGY OF) No. C 420 153
19 CALIFORNIA,)
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21 Plaintiff,) DECLARATION OF
22) JOHN G. PETERSON
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24 v.)
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26 GERALD ARMSTRONG,)
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19 I, JOHN G. PETERSON, declare as follows:

20 1. I am an attorney licensed to practice law in the
21 State of California. I am counsel of record for the Church of
22 Scientology of California (hereinafter "the Church") in both
23 the above-captioned action and in the case of Wollersheim v.
24 Church of Scientology of California, et al., Los Angeles
25 Superior Court Civil Action No. C 332 027. The statements
26 herein are made of my own personal knowledge and, if called as
27 a witness, I can and will testify competently thereto.
28

EXHIBIT B

1 JOSEPH A. YANNY, ESQ.
HERZIG & YANNY
2 9465 Wilshire Blvd., Suite 428
Beverly Hills, California 90212
3 Telephone: 213/272-8671

4 JOHN G. PETERSON, ESQ.
PETERSON & BRYNAN
5 8530 Wilshire Blvd. Suite 407
Beverly Hills, California 90211
6 Telephone: 213/659-9968

7
8 Attorneys for Plaintiffs

FILED
NOV 5 1985
CLERK, U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
BY

9
10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA
12

13 RELIGIOUS TECHNOLOGY CENTER; a)
California corporation, and CHURCH)
14 OF SCIENTOLOGY INTERNATIONAL INC.,)
a California corporation,)
15 Plaintiffs,)

16 v.)

17 LARRY WOLLERSHEIM, an individual;)
18 JON ZEGEL, an individual; DEDE)
REISDORF, an individual; DAVID)
19 MAYO, an individual; RICHARD)
OFSHE, an individual; MARGARET)
20 SINGER, an individual; HARVEY)
HABER, an individual; CHARLES B.)
21 O'REILLY, an individual; LETA)
SCHLOSSER, an individual; CHURCH)
22 OF THE NEW CIVILIZATION, (dba)
ADVANCED ABILITY CENTER) a)
23 California corporation; GREENE,)
O'REILLY, BROILLET, PAUL, SIMON,)
24 McMILLAN, WHEELER AND ROSENBERG,)
a California Corporation; and)
25 DOES 1 through 100, inclusive,)
26 Defendants.)

CIVIL ACTION NO. *mrf*
85 7197 ~~XXXX~~ (GX)
TEMPORARY RESTRAINING
ORDER; AND ORDER TO SHOW
CAUSE

27
28 ///

1 The court having considered the Complaint, supporting
2 declarations, exhibits, and points and authorities submitted
3 in support of Plaintiffs' Motion for a Temporary Restraining
4 Order, and good cause being shown that this is a proper case
5 for issuance of an order to show cause and a temporary
6 restraining order, the Court finds that Plaintiff is likely
7 to succeed on the merits or at least that sufficiently
8 serious questions going to the merits of the case have been
9 established to make them a fair ground for litigation and
10 that unless the temporary restraining order issues
11 immediately and without notice, Plaintiffs will suffer
12 irreparable harm by way of loss of trade secrets in
13 connection with its confidential religious documents.

14 THEREFORE, IT IS HEREBY ORDERED:

15 1. That Defendants show cause before this court at
16 courtroom 15 of the United States Courthouse at 312 North
17 Spring Street, Los Angeles, California, on the 8th day of
18 November, 1985 at 4:30 o'clock P. m., or as soon thereafter
19 as counsel can be heard, why a preliminary injunction,
20 pursuant to Rule 65, F.R.C.P., should not issue enjoining
21 Defendants, their agents, servants, employees, attorneys and
22 those person in active concert or participation with them or
23 who are acting at their request or insistence who receive
24 actual notice by personal service or otherwise, and each of
25 them, pending the final hearing and determination of this
26 action from:

27 ///

28 ///

1 (a) distributing, exhibiting or in any manner
2 publicly revealing to third parties any and all
3 copies, originals, retypings, recastings, variations of,
4 altered versions of all confidential religious
5 scriptures of Plaintiffs known as:

6 (1) SOLO PART II, (2) POWER, (3) R6EW, (4) DCSI, (5)
7 SUNSHINE RUNDOWN, (6) Clearing Course, (7) OT I, (8) OT
8 II, (9) OT III, (10) OT IV, (11) OT V or "NOTS", (12) OT
9 VI or "SOLO NOTS" and (13) OT VII.

10 (b) requiring Defendants to keep a list of all people
11 with access to the confidential religious scriptures
12 referred to in paragraph 1(a).

13 (c) requiring Defendants to keep all confidential
14 religious scriptures referred to in paragraph 1 (a) in a
15 locked storage cabinet or safe;

16 (d) Prohibiting Defendants from distributing all
17 religious scriptures referred to in 1 (a) inside and
18 outside of the United States; and

19 (e) enjoining Defendants from using all confidential
20 religious scriptures and variations thereof referenced
21 to paragraph 1 (a) above.

22 2. That pending the hearing and determination of
23 Plaintiffs' Application for a Preliminary Injunction,
24 Defendants, their agents, servants, employees, attorneys and
25 all other persons in active concert or participation with
26 them, be and hereby are, without prior written or oral
27 notice, temporarily restrained and enjoined from in any
28 manner, either directly or indirectly, committing any of the

1 acts set forth in Paragraph 1 above which are sought to be
2 enjoined by Plaintiffs; and, it is further

3 3. ORDERED that Plaintiffs shall post a bond in a form
4 approved by the court in the sum of \$ 5,000.00 ^{by 12:00 noon} as ¹¹⁻⁶⁻⁸⁵
5 security for the payment of such costs and damages as may be
6 incurred or suffered by any party who is subsequently found
7 to be wrongfully enjoined or restrained hereby;

8 4. That service of the Summons and Complaint and of
9 this Order together with copies of the papers in support
10 thereof, may be made by Plaintiffs' attorneys or their duly
11 qualified agents or employees on Defendants on or before
12 12 o'clock P. m. on November 7, 1985 and that such
13 service be deemed sufficient service; and

14 5. Any documents referred to in paragraph 1(a) above
15 which may be filed with the court in this action shall be
16 filed in a sealed envelope or container, marked on the
17 outside with the title of the action and identification of
18 each document within and a statement substantially in the
19 following form:

20 "CONFIDENTIAL - SUBJECT TO COURT ORDER

21 This envelope (or container) containing the above
22 identified papers filed by (name of party), is not
23 to be opened nor the contents thereof displayed or
24 revealed except by COURT ORDER or by agreement of
25 the parties."

26 ///

27 ///

28

1 6. That papers opposing a preliminary injunction, if
2 any, be filed with the court and personally served upon
3 Plaintiffs' counsel, Herzig & Yanny, 9465 Wilshire Boulevard,
4 Suite 428, Beverly Hills, California 90212, on or before
5 November 8, 1985. ^{12:00 noon} That any papers in reply to the
6 opposition of Defendants, be filed with the court and served
7 upon Defendants, or their attorneys, on or before ~~_____~~,
8 1985.

9
10 DATED: November 5, 1985 4:00 p.m.

11 Miriam R. Peltz
12
13 Judge United States
14 District Court

15 PRESENTED BY:

16 Joseph A. Yanny
17
18 JOSEPH A. YANNY
19 HERZIG & YANNY
20 9465 Wilshire Blvd., Suite 428
21 Beverly Hills, California 90212
22 Attorneys for Plaintiffs

23 I hereby attest and certify that the foregoing is a true and correct copy of the original as the same appears in my legal custody.
24
25 5 NOV 1985
26 CLERK U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
27 Poly Hay Deputy
28



EXHIBIT C

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 FOR THE COUNTY OF LOS ANGELES

3 DEPARTMENT NO. 55

HON. RONALD SWEARINGER, JUDGE

4
5 LARRY WOLLERSHEIM,)

6 Plaintiff,)

7 vs.)

NO. C 332 027

8 CHURCH OF SCIENTOLOGY OF)
9 CALIFORNIA, a corporation, et al.,)

10 Defendants.)
_____)

11
12 REPORTERS' DAILY TRANSCRIPT

13 THURSDAY, MARCH 13, 1986

14 A.M. SESSION

15 APPEARANCES:

16 For Plaintiff:

17 GREENE, O'REILLY, BROILLET,
18 PAUL, SIMON, McMILLAN,
19 WHEELER & ROSENBERG
BY: CHARLES O'REILLY and
LETA SCHLOSSER

20 For the Defendants:

PAUL F. MOORE

21 COOLEY, MANION, MOORE & JONES
BY: EARLE C. COOLEY

22 OVERLAND, BERKE, WESLEY, GITS,
23 RANDOLPH & LEVANAS
BY: ROBERT BERKE

24
25
26 VOLUME 17

27 Pages 2207 to 2294 .

JOANNE EKERLING, CSR #2250
CAROLYN F. LAMPKIN, CSR
OFFICIAL COURT REPORTERS

2 DAY	DATE	SESSION	PAGE
3 THURSDAY	MARCH 13, 1986	A.M.	2207
4		P.M.	2295

5 -----

6
7 CHRONOLOGICAL AND ALPHABETICAL INDEX OF WITNESSES

8 PLAINTIFF'S WITNESS	DIRECT	CROSS	REDIRECT	RECROSS	VOIR DIRE
9 SINGER, MARGARET THALER					
10	(RES.)	2237			2260
11	"	2252			

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17 EXHIBITS

18	PLAINTIFF'S EXHIBITS:	FOR IDENTIFICATION	IN EVIDENCE
19	20	21	22
80	LIST OF SCIENTOLOGY PUBLICATIONS	2312	
81	"REFERENCES ON SCIENTOLOGY" LIST	2313	

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1 WITH THE COURT. I KNOW MR. COOLEY HAS FROM TIME TO TIME
2 GOTTEN UPSET WITH THE COURT.. AND THE POINT BEING IS
3 THAT WE SEE THIS, WHAT'S GOING ON HERE IN ONE PARTICULAR
4 WAY.

5 THE COURT: I AM SORRY. YOU SEE WHAT'S GOING ON
6 AND YOU WANT TO TAKE IT AWAY?

7 REV. HODEN: IN ONE PARTICULAR WAY.

8 THE COURT: OH. OKAY.

9 REV. HODEN: SO, IN OTHER WORDS, WE HAVE BEEN TRYING
10 TO GET THE POINT ACROSS TO YOU, AND SOMETIMES OUT OF
11 FRUSTRATION YOU GET ANGRY SOMETIMES.

12 THE COURT: WHO GETS ANGRY?

13 REV. HODEN: I GET ANGRY SOMETIMES PERSONALLY.

14 THE COURT: YOU ARE NOT SAYING I GET ANGRY?

15 REV. HODEN: NO, I GET ANGRY SOMETIMES OUT OF FRUSTRATION
16 IN TRYING TO GET A POINT ACROSS.

17 THE COURT: OKAY.

18 REV. HODEN: SOMETIMES WHEN THE POINT DOESN'T SEEM
19 TO BE GETTING ACROSS IT LEADS TO FURTHER FRUSTRATION.

20 I DON'T WANT TO BOTHER YOU WITH A LOT OF
21 STUFF THAT'S ALREADY BEEN ARGUED AND ALREADY BEEN SAID.
22 SO THAT I COULD ACTUALLY HELP THE COURT IN MAKING ITS
23 DECISION ON THIS POINT, PERHAPS YOU CAN SHED A BIT OF
24 LIGHT FOR ME SO THAT I CAN ANSWER YOUR QUESTIONS ON WHY
25 YOU THINK IT'S PERMISSIBLE FOR THE SACRED UPPER LEVELS
26 OF THE CHURCH OF SCIENTOLOGY TO BE PRESENTED TO THE JURY.

27 THE COURT: WELL, THAT'S NOT WHAT'S OCCURRING.
28 WE ARE NOT GOING INTO THE CONTENTS OF THOSE UPPER LEVEL

1 MATERIALS. REV. HODEN, IF YOU HAD BEEN HERE YESTERDAY,
2 PERHAPS YOU WOULD HAVE NOTED THAT.

3 REV. HODEN: PERHAPS YOU CAN CLARIFY THAT. MAYBE
4 I DON'T UNDERSTAND.

5 THE COURT: MAYBE YOU ARE JUST NOT LISTENING.

6 REV. HODEN: I AM LISTENING VERY CAREFULLY.

7 THE COURT: OKAY.

8 REV. HODEN: AND I SAW THOSE PACKETS OF MATERIALS,
9 POWER, CLEARING, R6EW. OT-3, ALL THE WAY UP TO NOTS,
10 OT'S GET PUT INTO LITTLE PACKETS AND ENTERED INTO COURT;
11 IS THAT NOT TRUE?

12 THE COURT: THEY ARE NOT IN EVIDENCE.

13 REV. HODEN: GET ENTERED INTO COURT HERE.

14 THE COURT: THEY ARE HERE AND THEY ARE IDENTIFIED
15 CONSISTENT WITH JUDGE PFAELZER'S RULING.

16 REV. HODEN: WELL, IF THEY ARE HERE, ARE THEY GOING
17 TO BE USED IN THE COURTROOM?

18 THE COURT: AS FAR AS I KNOW, THERE IS NO INTENTION
19 TO GO INTO THE SPECIFIC CONTENT OF THE UPPER-LEVEL MATERIALS.

20 REV. HODEN: MR. O'REILLY, ARE YOU GOING TO SHOW
21 THESE TWO ANY WITNESSES?

22 THE COURT: JUST A MOMENT.

23 REV. HODEN: HE WILL GET A CHANCE TO TALK --

24 THE COURT: JUST A MOMENT. THAT APPEARS TO BE
25 AN ISSUE.

26 ARE YOU GOING INTO SPECIFIC CONTENTS OF THE
27 UPPER LEVEL MATERIALS?

28 MR. O'REILLY: THE WITNESS, DR. SINGER, IS NOT
GOING TO READ FROM OR QUOTE OR ADDRESS THE CONTENTS OF

EXHIBIT D

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 FOR THE COUNTY OF LOS ANGELES

3 DEPARTMENT NO. 55

HON. RONALD SWEARINGER, JUDGE

4
5 LARRY WOLLERSHEIM,

6 Plaintiff,

7 vs.

8 CHURCH OF SCIENTOLOGY OF
9 CALIFORNIA, a corporation, et al.,

10 Defendants.

32

NO. C 332 027

11
12 REPORTERS' DAILY TRANSCRIPT

13 Thursday, April 3, 1986

14
15 APPEARANCES:

16 For Plaintiff:

17 GREENE, O'REILLY, BROILLET,
18 PAUL, SIMON, McMILLAN,
19 WHEELER & ROSENBERG
20 BY: CHARLES O'REILLY and
21 LETA SCHLOSSER

22 For the Defendants:

23 PAUL F. MOORE
24 COOLEY, MANION, MOORE & JONES
25 BY: EARLE C. COOLEY
26 OVERLAND, BERKE, WESLEY, GITS,
27 RANDOLPH & LEVANAS
28 BY: ROBERT BERKE

COPY

26 VOLUME 32

27 Pages 4691 to 4788.

28 JOANNE EKERLING, CSR #2250
CAROLYN F. LAMPKIN, CSR
OFFICIAL COURT REPORTERS

1 INDEX FOR VOLUME 32 PAGES 4691 through 4788, incl.

2 DAY DATE SESSION PAGE

3 Thursday April 3, 1986 A.M. 4691

4 -----

5

6

7

CHRONOLOGICAL AND ALPHABETICAL INDEX OF WITNESSES

8

9 PLAINTIFF'S WITNESSES DIRECT CROSS REDIRECT RECROSS

10

JESSUP, Amos Huntington
(Under 776 E.C)
(Resumed)

11

4691 4762 4764

12

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WOLLERSHEIM, Lawrence
Dominic

4765

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15 1 MR. O'REILLY: Okay. Your Honor, might this be
2 a convenient time? I want to go back and go into specifics
3 and be sure to talk to the court beforehand.

4 THE COURT: Let's adjourn for the day.

5 We will start tomorrow morning at --

6 THE CLERK: 9 o'clock.

7 THE COURT: -- 9 o'clock.

8 Remember the admonition.

9 (At 11:25 the jury was excused and

10 the following proceedings were had:)

11 MR. COOLEY: We go down at 1:30, your Honor?

12 THE COURT: 1:30, fine.

13 MR. COOLEY: Mr. O'Reilly has indicated he wants
14 to get the court's advice on something. I think it might
15 be appropriate to stay and get it.

16 THE COURT: Yes. Yes.

17 There are no jurors present.

18 What did you want to make an inquiry about?

19 MR. O'REILLY: Well, your Honor, probably some
20 time within the next 30 minutes or so the examination
21 I am going to get into, him leaving Scientology organization
22 in Los Angeles -- I mean, in Minneapolis and coming out
23 here to Los Angeles for what was called the Power process
24 of auditing.

25 And I am going to be asking him questions
26 about basically what happened to him on that particular
27 process.

28 So what I wanted to do was clear with the

1 court beforehand that, like, your Honor, now I am going
2 to go into this particular area and I want to be sure
3 that I haven't misunderstood the court's ruling, or whatever,
4 when I do so.

5 He will not be testifying about anything
6 that's contained in those documents that were sealed
7 and stamped confidential when they were identified on
8 the record, the upper level materials. He will not be
9 testifying from those or about the contents of those
10 in any respect.

11 MR. COOLEY: Well, then I understand that although
12 we have objected to even that, that it complies with
13 the court's ground rule that there be no testimony
14 from those documents or about their contents --

15 THE COURT: In the so-called upper levels materials.

16 MR. COOLEY: Yes, sir. The upper levels materials
17 being defined as power through NOTS.

18 THE COURT: Power through NOTS.

19 All right.

20 MR. O'REILLY: I understand.

21 THE COURT: Okay.

22 MR. O'REILLY: One other thing, your Honor.

23 MR. COOLEY: And the L12 materials as well, your
24 Honor.

25 MR. O'REILLY: We don't have the L12's anyway.

26 THE COURT: Whatever has been categorized as upper
27 level materials.

28 MR. O'REILLY: One other thing, your Honor:

EXHIBIT E

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DEPARTMENT NO. 55

HON. RONALD SWEARINGER, JUDGE

LARRY WOLLERSHEIM,

Plaintiff,

vs.

CHURCH OF SCIENTOLOGY OF
CALIFORNIA, a corporation, et al.,

Defendants.

51

NO. C 332 027

REPORTERS' DAILY TRANSCRIPT

Tuesday, May 6, 1986

A.M. SESSION ONLY

APPEARANCES:

For Plaintiff:

GREENE, O'REILLY, BROILLET,
PAUL, SIMON, McMILLAN,
WHEELER & ROSENBERG
BY: CHARLES O'REILLY and
LETA SCHLOSSER

For the Defendants:

PAUL F. MOORE

COOLEY, MANION, MOORE & JONES
BY: EARLE C. COOLEY

OVERLAND, BERKE, WESLEY, GITS,
RANDOLPH & LEVANAS
BY: ROBERT BERKE

COPY

VOLUME 51

Pages 7670 to 7668.

JOANNE EKERLING, CSR #2250
CAROLYN F. LAMPKIN, CSR
OFFICIAL COURT REPORTERS

1 MR. COOLEY: I take it by now that the court has read
2 the -- all of the lower level PC folders.

3 THE COURT: I have been through them twice.

4 MR. COOLEY: The thing that I wanted to just comment on to
5 the court, because it seems to me to be a matter of such
6 momentous importance as to just what direction this case is
7 going to take, bearing in mind I will undoubtedly be recalling
8 Mr. Wollersheim in my case. These PC folders will create
9 tremendous confusion and side shows in this case, I think,
10 your Honor.

11 Number one, they are written in a way that it is
12 open to interpretation. Mr. Wollersheim interpreting one way
13 and case supervisor interpreting another. They are not naratives.
14 They are notes which were taken.

15 At the very -- as an example, at his very first
16 session back in July of 1971, at page 78, he talks about
17 taking --

18 MR. O'REILLY: Excuse me. Your Honor, how can we
19 even begin to address this? We haven't even seen one
20 document out of that whole file.

21 THE COURT: Let's finish. Let's hear what he has to say.

22 MR. O'REILLY: He is now talking about specifics from
23 the PC folder.

24 MR. COOLEY: I am pointing out to the court the reason
25 why I think they should not be turned over.

26 MR. O'REILLY: How can we respond? We have not even
27 seen a piece of paper.

28 MS. SCHLOSSER: Who knows if they are correct or not?

EXHIBIT F

3-10-85

Last night or I dreamed
I received a warning to not
fuck the talking pig. If
I did I would myself turn
into a pig.

Sometime later, sure enough,
there appeared a pig, a sow,
pink and hairy. She turned
her ass toward me, almost
in my face, and turned
her head back looking at
me with staring pink eyes.
Her snout was flat and
dirty. Her ears flopped
down. Her mouth didn't
move but she asked in

perfect English if I'd like
to fuck her. There were
traces of shit around her
cunt.

I wanted to fuck her
but I said no. She
disappeared. I woke up.

I have thoughts of her
several times today. She
was there. I'm still
here. I've never fuck a cog.

G. [Signature]

EXHIBIT G

1 LIST OF PASTORAL COUNSELLING SESSIONS

2 CONFESSIOAL FORMULARIES OF GERALD ARMSTRONG

3 FOLDER #1

4 DATE

MINISTER

LOCATION

5 _____
6 17 Mar 70

M. Ross

NOT LISTED

7 26 Mar 70

D. Knight

NOT LISTED

8 30 Mar 70

D. Knight

NOT LISTED

9 31 Mar 70

D. Knight

Little Mountain

10 1 Apr 70

D. Knight

NOT LISTED

11 2 Apr 70

D. Knight

NOT LISTED

12 3 Apr 70

D. Knight

Little Mountain

13 7 Apr 70

D. Knight

NOT LISTED

14 7 Apr 70

D. Knight

NOT LISTED

15 8 Apr 70

D. Knight

NOT LISTED

16 13 Apr 70

D. Knight

NOT LISTED

17 14 Apr 70

D. Knight

NOT LISTED

18 14 Apr 70

D. Knight

Little Mountain

19 15 Apr 70

D. Knight

NOT LISTED

20 17 Apr 70

D. Knight

Little Mountain

21 20 Apr 70

D. Knight

Little Mountain

22 21 Apr 70

D. Knight

Little Mountain

23 16 May 70

Kingsley Wimbush

NOT LISTED

24 22 May 70

Kingsley Wimbush

Little Mountain

25 23 May 70

Kingsley Wimbush

NOT LISTED

26 1 Jun 70

Kingsley Wimbush

NOT LISTED

27 15 Jun 70

K. Wimbush

NOT LISTED

1	16 Jun 70	K. Wimbush	Little Mountain
2	16 Jun 70	G. Leese	Little Mountain
3	13 July 70	K. Wimbush	NOT LISTED
4	15 July 70	K. Wimbush	NOT LISTED
5	6 Sept 70	G. Leese	Little Mountain
6	10 Sept 70	G. Leese	Little Mountain
7	3 Nov 70	G. Leese	Little Mountain
8	5 Nov 70	G. Leese	Little Mountain
9	9 Nov 70	G. Leese	Little Mountain
10	12 Jan 71	Joan McCandless	NOT LISTED
11	28 Jan 71	G. Leese	Little Mountain
12	15 Feb 71	Jim Boland	NOT LISTED
13			
14	<u>FOLDER #2</u>		
15	<u>DATE</u>	<u>MINISTER</u>	<u>LOCATION</u>
16			
17	21 Jun 71	Marie Passmore	NOT LISTED
18	19 Feb 71	NO AUDITOR	NOT LISTED
19	21 July 71	B. Strasser	NOT LISTED
20	22 July 71	Bill Strasser	NOT LISTED
21	22 July 71	B. Strasser	NOT LISTED
22	22 July 71	Bill Strasser	NOT LISTED
23	22 July 71	Bill Strasser	NOT LISTED
24	24 July 71	Bill Strasser	NOT LISTED
25	24 July 71	Bill Strasser	NOT LISTED
26	15 Sept 71	Jeff W.	NOT LISTED
27	16 Sept 71	Jeff W.	NOT LISTED
28			

1	28 Sept 71	Jeff W.	NOT LISTED
2	28 Sept 71	Jeff Walk	NOT LISTED
3	30 Sept 71	K. Gleeson	NOT LISTED
4	30 Sept 71	K. Gleeson	NOT LISTED
5	1 Oct 71	Toby Paul	NOT LISTED
6	3 Oct 71	Toby Paul	NOT LISTED
7	3 Oct 71	Toby Paul	NOT LISTED
8	4 Oct 71	Toby Paul	NOT LISTED
9	4 Oct 71	Toby Paul	NOT LISTED
10	5 Oct 71	Toby Paul	NOT LISTED
11	5 Oct 71	Toby Paul	NOT LISTED
12	8 Oct 71	Sally Leopolv	NOT LISTED
13	12 Oct 71	Sue Mason	NOT LISTED
14	13 Oct 71	Sue Mason	NOT LISTED
15	13 Oct 71	Sue Mason	NOT LISTED
16	23 Oct 71	Ron Strauss	NOT LISTED
17	1 Nov 71	Jo Albert	NOT LISTED
18	2 Nov 71	Jo Albert	NOT LISTED
19	22 Nov 71	Jo Albert	NOT LISTED
20	1 Feb 72	Cathy C.	NOT LISTED
21	3 Feb 72	Cathy C.	NOT LISTED
22	6 Feb 72	Cathy C.	NOT LISTED
23	8 Feb 72	Cathy C.	NOT LISTED
24	12 Feb 72	Cathy C.	NOT LISTED
25	13 Feb 72	Cathy C.	NOT LISTED

26 ///

27 ///

28

1 FOLDER #3

2	<u>DATE</u>	<u>MINISTER</u>	<u>LOCATION</u>
3			
4	16 Feb 72	Cathy C.	NOT LISTED
5	20 Feb 72	Cathy C.	NOT LISTED
6	21 Feb 72	Cathy C.	NOT LISTED
7	21 Feb 72	Cathy C.	NOT LISTED
8	26 Feb 72	Cathy C.	NOT LISTED
9	27 Feb 72	Cathy C.	NOT LISTED
10	28 Feb 72	Cathy C.	NOT LISTED
11	3 Mar 72	Cathy C.	NOT LISTED
12	3 Mar 72	Cathy C.	NOT LISTED
13	8 Mar 72	Cathy C.	NOT LISTED
14	15 Mar 72	Cathy C.	NOT LISTED
15	16 Mar 72	Phyll Stevens	NOT LISTED
16	19 Mar 72	Phyll Stevens	NOT LISTED
17	20 Mar 72	Phyll Stevens	NOT LISTED
18	29 Apr 72	J.M. Jewel	NOT LISTED
19	29 Apr 72	J.M. Jewel	NOT LISTED
20	30 Apr 72	J.M. Jewel	NOT LISTED
21	16 Mar 72	Cathy C.	NOT LISTED
22	15 Apr 72	Cathy C.	NOT LISTED
23	31 Dec 72	R. Anderson	NOT LISTED
24	9 Jan 73	B. Bishop	NOT LISTED
25	12 Feb 73	NOT GIVEN	NOT LISTED
26	///		
27	///		
28			

1 FOLDER #42 DATEMINISTERLOCATION

3

4 17 Feb 73

NOT GIVEN

NOT GIVEN

5 18 Feb 73

Tamia Arbuckle

NOT LISTED

6 19 Feb 73

Tamia Arbuckle

NOT GIVEN

7 16 Mar

NOT GIVEN

NOT GIVEN

8 14 Apr 73

Alycia Danilovich

NOT LISTED

9 17 Apr 73

NOT GIVEN

NOT LISTED

10 5 May 73

NOT GIVEN

NOT LISTED

11 12 May 73

B. Bishop

NOT LISTED

12 12 May 73

Alycia Danilovich

NOT LISTED

13 12 June 73

NOT GIVEN

NOT LISTED

14 26 July 73

NOT GIVEN

NOT LISTED

15 28 July 73

John Danilovich

NOT LISTED

16 29 July 73

John Danilovich

NOT LISTED

17 30 July 73

John Danilovich

NOT LISTED

18 4 Aug 73

John Danilovich

NOT GIVEN

19 5 Aug 73

John Danilovich

NOT GIVEN

20 12 Sept 73

B. Bishop

NOT LISTED

21 25 Sept 73

B. Blach

NOT GIVEN

22 23 Sept 73

B. Blach

NOT GIVEN

23 10 Nov 73

Monica Pignotti

NOT LISTED

24 18 Nov 73

Shaffy

NOT LISTED

25 23 Nov 73

Shaffy

NOT LISTED

26 26 Nov 73

Bridget Marpel

NOT LISTED

27 28 Nov 73

G. Hof

NOT LISTED

28

1	3 Dec 73	B. Haes	NOT LISTED
2	10 Dec 73	B. Haes	NOT LISTED
3	5 Jun 74	A. Knowaty	NOT LISTED
4	8 Jun 74	A. Knowaty	NOT LISTED
5	14 Jun 74	A. Knowaty	NOT LISTED
6	7 July 74	Lisa Aerleen	NOT LISTED
7	13 July 74	B. Haes	NOT LISTED
8	18 July 74	A. Knowaty	NOT LISTED

9

10 FOLDER #5

11 DATE

MINISTER

LOCATION

12

13	8 Sept 74	J. Hare	NOT LISTED
14	18 Sept 74	B.L. Haur	NOT LISTED
15	5 Oct 74	B. Haes	NOT LISTED
16	20 Oct 74	B. Haes	NOT GIVEN
17	3 Nov 74	Licke Halders	NOT LISTED
18	16 Nov 74	Licke Halders	NOT GIVEN
19	5 Jan 75	D of P	NOT GIVEN
20	16 Feb 75	John Eastment	NOT LISTED
21	24 Mar 75	Ron Norton	NOT LISTED
22	18 Jan 75	Ron Norton	NOT GIVEN
23	16 Feb 75	Ron Norton	NOT GIVEN
24	14 Jan 75	Ron Norton	NOT GIVEN
25	13 Jan 75	Ron Norton	NOT GIVEN
26	6 Jan 75	Ron Norton	NOT GIVEN
27	26 Mar 75	Randy H. Ford	NOT LISTED

28

1	25 Mar 75	Randy H. Ford	NOT LISTED
2	13 Apr 75	Randy H. Ford	NOT LISTED
3	12 Apr 75	Randy H. Ford	NOT LISTED

4 FOLDER #6

5	DATE	MINISTER	LOCATION
6	_____	_____	_____
7			
8	31 Oct 75	D of P	NOT GIVEN
9	24 Nov 75	Jan Morris	NOT LISTED
10	25 Nov 75	Jan Morris	NOT LISTED
11	26 Nov 75	Jan Morris	NOT LISTED
12	1 Dec 75	Jan Morris	NOT GIVEN
13	5 Jan 76	John Housen	NOT GIVEN
14	3 Feb 76	Bridge Marple	NOT GIVEN
15	14 Apr 75	R.H. Ford	NOT GIVEN
16	22 Apr 75	Penney H. Ford	NOT GIVEN
17	23 Apr 75	Penney Hubbard Ford	NOT LISTED
18	25 July 75	D of P	NOT GIVEN

19

20 FOLDER #7

21	DATE	MINISTER	LOCATION
22	_____	_____	_____
23	1 Sept 76	Andre Clavel	NOT GIVEN
24	2 Sept 76	Andre Clavel	NOT GIVEN
25	3 Sept 76	Andre Clavel	NOT GIVEN
26	4 Sept 76	Andre Clavel	NOT GIVEN
27	5 Sept 76	Andre Clavel	NOT GIVEN

28

1	5 Sept 76	Andre Clavel	NOT GIVEN
2	10 Sept 76	Andre Clavel	NOT GIVEN
3	10 Sept 76	Andre Clavel	NOT GIVEN
4	7 Sept 76	Andre Clavel	NOT GIVEN
5	7 Sept 76	Andre Clavel	NOT GIVEN
6	9 Sept 76	Andre Clavel	NOT GIVEN
7	9 Sept 76	Andre Clavel	NOT GIVEN
8	11 Sept 76	Andre Clavel	NOT GIVEN
9	12 Sept 76	Andre Clavel	NOT GIVEN
10	12 Sept 76	Andre Clavel	NOT GIVEN
11	13 Sept 76	Andre Clavel	NOT GIVEN
12	14 Sept 76	Andre Clavel	NOT GIVEN
13	14 Sept 76	Andre Clavel	NOT GIVEN
14	15 Sept 76	Andre Clavel	NOT GIVEN
15	16 Sept 76	Andre Clavel	NOT GIVEN
16	21 Sept 76	Andre Clavel	NOT GIVEN
17	20 Sept 76	Andre Clavel	NOT GIVEN
18	20 Sept 76	Andre Clavel	NOT GIVEN
19	20 Sept 76	Andre Clavel	NOT GIVEN
20	19 Sept 76	Andre Clavel	NOT GIVEN
21	18 Sept 76	Andre Clavel	NOT GIVEN
22	18 Sept 76	Andre Clavel	NOT GIVEN
23	18 Sept 76	Andre Clavel	NOT GIVEN
24	17 Sept 76	Andre Clavel	NOT GIVEN
25	22 Sept 76	Andre Clavel	NOT GIVEN
26	///		
27	///		
28	///		

1 FOLDER #8

2	<u>DATE</u>	<u>MINISTER</u>	<u>LOCATION</u>
3			
4	24 Sept 76	Andre Clavel	NOT GIVEN
5	24 Sept 76	Andre Clavel	NOT GIVEN
6	25 Sept 76	A. Clavel	NOT GIVEN
7	26 Sept 76	Andre Clavel	NOT GIVEN
8	27 Sept 76	Andre Clavel	NOT GIVEN
9	28 Sept 76	Andre Clavel	NOT GIVEN
10	29 Sept 76	Andre Clavel	NOT GIVEN
11	1 Oct 76	Andre Clavel	Clearwater
12	2 Oct 76	Andre Clavel	Clearwater
13	3 Oct 76	Andre Clavel	Clearwater
14	5 Oct 76	Andre Clavel	Clearwater
15	6 Oct 76	Andre Clavel	Clearwater
16	7 Oct 76	Andre Clavel	Clearwater
17	8 Oct 76	Andre Clavel	NOT GIVEN
18	9 Oct 76	Andre Clavel	Clearwater
19	10 Oct 76	Andre Clavel	Clearwater
20	12 Oct 76	Andre Clavel	Clearwater
21	13 Oct 76	Andre Clavel	Clearwater
22	14 Oct 76	Andre Clavel	Clearwater
23	15 Oct 76	Andre Clavel	Clearwater
24	16 Oct 76	NOT GIVEN	Clearwater
25	17 Oct 76	NOT GIVEN	Clearwater
26	18 Oct 76	NOT GIVEN	Clearwater
27	19 Oct 76	NOT GIVEN	Clearwater

28

1	21 Oct 76	NOT GIVEN	Clearwater
2	22 Oct 76	Andre Clavel	Clearwater
3	23 Oct 76	Andre Clavel	Clearwater
4	<u>FOLDER #9</u>		
5	<u>DATE</u>	<u>MINISTER</u>	<u>LOCATION</u>
6			
7	25 Oct 76	no name	Clearwater
8	27 Oct 76	no name	Clearwater
9	28 Oct 76	no name	Clearwater
10	29 Oct 76	no name	Clearwater
11	30 Oct 76	no name	Clearwater
12	30 Oct 76	no name	Clearwater
13	30 Oct 76	no name	NOT GIVEN
14	31 Oct 76	Andre Clavel	Clearwater
15	2 Nov 76	Andre Clavel	Clearwater
16	3 Nov 76	Andre Clavel	Clearwater
17	4 Nov 76	Andre Clavel	Clearwater
18	5 Nov 76	Andre Clavel	Clearwater
19	7 Nov 76	Andre Clavel	Clearwater
20	9 Nov 76	Brian Charlton	Clearwater
21	10 Nov 76	Andre Clavel	Clearwater
22	10 Nov 76	Andre Clavel	Clearwater
23	11 Nov 76	Andre Clavel	Clearwater
24	13 Nov 76	Andre Clavel	Clearwater
25	15 Nov 76	Andre Clavel	Clearwater
26	15 Nov 76	Andre Clavel	Clearwater

27
28

1	18 Nov 76	Andre Clavel	Clearwater
2	19 Nov 76	Andre Clavel	Clearwater
3	20 Nov 76	Andre Clavel	NOT GIVEN
4	22 Nov 76	Andre Clavel	NOT GIVEN
5	23 Nov	MO REPORT	Clearwater
6	24 Nov 76	Jill Goodman	Clearwater
7	25 Nov 76	Andre Clavel	Clearwater
8	26 Nov 76	D OF P	Clearwater
9	26 Nov 76	Andre Clavel	Clearwater
10			
11	<u>FOLDER #10</u>		
12	<u>DATE</u>	<u>MINISTER</u>	<u>LOCATION</u>
13			
14	27 Nov 76	Andre Clavel	NOT GIVEN
15	29 Nov 76	Andre Clavel	NOT GIVEN
16	30 Nov 76	Andre Clavel	Clearwater
17	8 Dec 76	Andre Clavel	Clearwater
18	10 Dec 76	Andre Clavel	Clearwater
19	10 Dec 76	Andre Clavel	Clearwater
20	11 Dec 76	Andre Clavel	Clearwater
21	11 Dec 76	Andre Clavel	Clearwater
22	12 Dec 76	Andre Clavel	Clearwater
23	13 Dec 76	Andre Clavel	Clearwater
24	17 Dec 76	Andre Clavel	Clearwater
25	15 Dec 76	Andre Clavel	Clearwater
26	16 Dec 76	Andre Clavel	Clearwater
27	18 Dec 76	Andre Clavel	Clearwater

28

1 FOLDER #11

2	<u>DATE</u>	<u>MINISTER</u>	<u>LOCATION</u>
3			
4	18 Dec 76	Andre Clavel	NOT GIVEN
5	19 Dec 76	Andre Clavel	NOT GIVEN
6	20 Dec 76	Andre Clavel	NOT GIVEN
7	20 Dec 76	Andre Clavel	NOT GIVEN
8	21 Dec 76	Andre Clavel	NOT GIVEN
9	22 Dec 76	Andre Clavel	NOT GIVEN
10	24 Dec 76	Andre Clavel	NOT GIVEN
11	26 Dec 76	Andre Clavel	NOT GIVEN
12	27 Dec 76	Andre Clavel	NOT GIVEN
13	29 Dec 76	Andre Clavel	NOT GIVEN
14	31 Dec 76	Andre Clavel	NOT GIVEN
15	2 Jan 77	Andre Clavel	NOT GIVEN
16	4 Jan 77	Andre Clavel	NOT GIVEN
17	6 Jan 77	Andre Clavel	NOT GIVEN
18	8 Jan 77	Andre Clavel	NOT GIVEN
19	10 Jan 77	Andre Clavel	NOT GIVEN
20	12 Jan 77	Andre Clavel	NOT GIVEN
21	14 Jan 77	Andre Clavel	NOT GIVEN
22	15 Jan 77	C. Rush	NOT GIVEN
23	15 Jan 77	Andre Clavel	NOT GIVEN
24	18 Jan 77	Andre Clavel	NOT GIVEN
25	16 Jan 77	Andre Clavel	NOT GIVEN
26	17 Jan 77	Andre Clavel	NOT GIVEN
27	17 Jan 77	Andre Clavel	NOT GIVEN

28

1	18 Jan 77	Andre Clavel	NOT GIVEN
2	20 Jan 77	Andre Clavel	NOT GIVEN
3	21 Jan 77	Andre Clavel	NOT GIVEN
4	23 Jan 77	Andre Clavel	NOT GIVEN
5	1 Feb 77	Andre Clavel	NOT GIVEN
6	3 Feb 77	Andre Clavel	NOT GIVEN
7	5 Feb 77	Andre Clavel	NOT GIVEN
8	6 Feb 77	Andre Clavel	NOT GIVEN
9	3 Feb 77	Andre Clavel	NOT GIVEN

10

11 FOLDER #12

12	<u>DATE</u>	<u>MINISTER</u>	<u>LOCATION</u>
13			
14	11 Feb 77	C. Rush	NOT GIVEN
15	18 Feb 77	C. Rush	NOT GIVEN
16	19 Feb 77	C. Rush	NOT GIVEN
17	20 Feb 77	C. Rush	NOT GIVEN
18	20 Feb 77	C. Rush	NOT GIVEN
19	21 Feb 77	C. Rush	NOT GIVEN
20	22 Feb 77	C. Rush	NOT GIVEN
21	23 Feb 77	C. Rush	NOT GIVEN
22	23 Feb 77	NOT GIVEN	NOT GIVEN
23	26 Feb 77	C. Rush	NOT GIVEN
24	27 Feb 77	C. Rush	NOT GIVEN
25	10 Feb 77	C. Rush	NOT GIVE

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1 FOLDER #13

2	<u>DATE</u>	<u>MINISTER</u>	<u>LOCATION</u>
3			
4	28 Feb 77	Andre Clavel	NOT GIVEN
5	2 Mar 77	Andre Clavel	NOT GIVEN
6	5 Mar 77	Andre Clavel	NOT GIVEN
7	6 Mar 77	Andre Clavel	NOT GIVEN
8	5 Mar 77	no name	NOT GIVEN
9	4 Mar 77	no name	NOT GIVEN
10	7 Mar 77	no name	NOT GIVEN
11	7 Mar 77	no name	NOT GIVEN
12	8 Mar 77	no name	NOT GIVEN
13	8 Mar 77	Andre Clavel	NOT GIVEN
14	8 Mar 77	Andre Clavel	NOT GIVEN
15	8 Mar 77	Andre Clavel	NOT GIVEN
16	8 Mar 77	Andre Clavel	NOT GIVEN
17	11 Mar 77	Andre Clavel	NOT GIVEN
18	11 Mar 77	Andre Clavel	NOT GIVEN
19	11 Mar 77	Andre Clavel	NOT GIVEN
20	12 Mar 77	Andre Clavel	NOT GIVEN
21	12 Mar 77	Andre Clavel	NOT GIVEN
22	14 Mar 77	Andre Clavel	NOT GIVEN
23	16 Mar 77	Andre Clavel	NOT GIVEN
24	16 Mar 77	Andre Clavel	NOT GIVEN
25	17 Mar 77	Andre Clavel	NOT GIVEN
26	17 Mar 77	Andre Clavel	NOT GIVEN
27	18 Mar 77	Andre Clavel	NOT GIVEN

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1	18 Mar 77	Andre Clavel	NOT GIVEN
2	20 Mar 77	Andre Clavel	NOT GIVEN
3			
4	<u>FOLDER #14</u>		
5	<u>DATE</u>	<u>MINISTER</u>	<u>LOCATION</u>
6			
7	7 Apr 77	Andre Clavel	NOT GIVEN
8	25 Mar 77	Andre Clavel	NOT GIVEN
9	26 Mar	Andre Clavel	NOT GIVEN
10	3 Apr 77	Andre Clavel	NOT GIVEN
11	9 Apr 77	Andre Clavel	NOT GIVEN
12	10 Apr 77	Andre Clavel	NOT GIVEN
13	18 Apr 77	Andre Clavel	NOT GIVEN
14	19 Apr 77	Andre Clavel	NOT GIVEN
15	20 Apr 77	Andre Clavel	NOT GIVEN
16	21 Apr 77	Andre Clavel	NOT GIVEN
17	22 Apr 77	Andre Clavel	NOT GIVEN
18	23 Apr 77	Andre Clavel	NOT GIVEN
19	26 Apr 77	Andre Clavel	NOT GIVEN
20	24 Apr 77	Andre Clavel	NOT GIVEN
21	27 Apr 77	Andre Clavel	NOT GIVEN

22	<u>FOLDER #15</u>		
23	<u>DATE</u>	<u>MINISTER</u>	<u>LOCATION</u>
24			
25	28 Apr 77	Andre Clavel	NOT GIVEN
26	29 Apr 77	Andre Clavel	NOT GIVEN
27	30 Apr 77	Andre Clavel	NOT GIVEN

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1	1 May 77	Andre Clavel	NOT GIVEN
2	3 May 77	Andre Clavel	NOT GIVEN
3	4 May 77	Andre Clavel	NOT GIVEN
4	5 May 77	Andre Clavel	NOT GIVEN
5	7 May 77	Andre Clavel	NOT GIVEN
6	9 May 77	Andre Clavel	NOT GIVEN
7	11 May 77	Andre Clavel	NOT GIVEN
8	13 May 77	Andre Clavel	NOT GIVEN
9	14 May 77	Andre Clavel	NOT GIVEN
10	15 May 77	Andre Clavel	NOT GIVEN
11	17 May 77	Andre Clavel	NOT GIVEN
12	17 May 77	Andre Clavel	NOT GIVEN
13	22 May 77	Andre Clavel	NOT GIVEN
14	27 May 77	Andre Clavel	NOT GIVEN
15	<u>FOLDER #16</u>		
16	DATE	MINISTER	LOCATION
17	_____	_____	_____
18			
19	29 May 77	Andre Clavel	NOT GIVEN
20	7 Jun 77	Andre Clavel	Clearwater
21	10 Jun 77	Andre Clavel	Clearwater
22	13 Jun 77	Andre Clavel	Clearwater
23	15 Jun 77	Andre Clavel	Clearwater
24	17 Jun 77	Andre Clavel	Clearwater
25	19 Jun 77	Andre Clavel	Clearwater
26	21 Jun 77	Andre Clavel	Clearwater
27	25 Jun 77	Andre Clavel	Clearwater

1	26 Jun 77	Andre Clavel	Clearwater
2	28 Jun 77	Andre Clavel	Clearwater
3	30 Jun 77	Andre Clavel	Clearwater
4	2 July 77	Andre Clavel	Clearwater
5	3 July 77	Andre Clavel	Clearwater
6	7 July 77	Andre Clavel	Clearwater

7 FOLDER #17

8	DATE	MINISTER	LOCATION
9	_____	_____	_____
10			
11	9 July 77	Andre Clavel	NOT GIVEN
12	10 July 77	Andre Clavel	NOT GIVEN
13	11 July 77	Andre Clavel	NOT GIVEN
14	13 July 77	Andre Clavel	NOT GIVEN
15	14 July 77	Andre Clavel	NOT GIVEN
16	15 July 77	Andre Clavel	NOT GIVEN
17	16 July 77	Andre Clavel	NOT GIVEN
18	18 July 77	Andre Clavel	NOT GIVEN
19	19 July 77	Andre Clavel	NOT GIVEN
20	22 July 77	Andre Clavel	NOT GIVEN
21	21 July 77	Andre Clavel	NOT GIVEN
22	20 July	Andre Clavel	NOT GIVEN

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1 FOLDER #18

2	<u>DATE</u>	<u>MINISTER</u>	<u>LOCATION</u>
3			
4	23 July 77	Andre Clavel	NOT GIVEN
5	24 July 77	Andre Clavel	NOT GIVEN
6	25 July 77	Andre Clavel	NOT GIVEN
7	26 July 77	Andre Clavel	NOT GIVEN
8	27 July 77	Andre Clavel	NOT GIVEN
9	29 July 77	Andre Clavel	NOT GIVEN
10	29 July 77	Andre Clavel	NOT GIVEN
11	31 July 77	Andre Clavel	NOT GIVEN
12	1 Aug 77	Andre Clavel	NOT GIVEN
13	2 Aug 77	Andre Clavel	NOT GIVEN
14	3 Aug 77	Andre Clavel	NOT GIVEN
15	5 Aug 77	Andre Clavel	NOT GIVEN

16 FOLDER #19

17	<u>DATE</u>	<u>MINISTER</u>	<u>LOCATION</u>
18			
19	6 Aug 77	Andre Clavel	NOT GIVEN
20	7 Aug 77	Andre Clavel	NOT GIVEN
21	8 Aug 77	Andre Clavel	NOT GIVEN
22	9 Aug 77	Andre Clavel	NOT GIVEN
23	11 Aug 77	Andre Clavel	NOT GIVEN
24	12 Aug 77	Andre Clavel	NOT GIVEN
25	14 Aug 77	Andre Clavel	NOT GIVEN
26	15 Aug 77	Andre Clavel	NOT GIVEN
27	16 Aug 77	Andre Clavel	NOT GIVEN

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1	17 Aug 77	Andre Clavel	NOT GIVEN
2	18 Aug 77	Andre Clavel	NOT GIVEN
3	19 Aug 77	Andre Clavel	NOT GIVEN
4	20 Aug 77	Andre Clavel	NOT GIVEN

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6 FOLDER #20

7	<u>DATE</u>	<u>MINISTER</u>	<u>LOCATION</u>
---	-------------	-----------------	-----------------

8

9	21 May 77	Andre Clavel	Clearwater
10	Aug 77	Andre Clavel	Clearwater
11	23 Aug 77	Andre Clavel	Clearwater
12	25 Aug 77	Andre Clavel	Clearwater
13	26 Aug 77	Andre Clavel	Clearwater
14	27 Aug 77	Andre Clavel	Clearwater
15	28 Aug 77	Andre Clavel	Clearwater
16	29 Aug 77	Andre Clavel	Clearwater
17	30 Aug 77	Andre Clavel	Clearwater
18	30 Aug 77	Andre Clavel	Clearwater
19	2 Sep 77	Andre Clavel	Clearwater
20	3 Sep 77	Andre Clavel	Clearwater

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22 FOLDER #21

23	<u>DATE</u>	<u>MINISTER</u>	<u>LOCATION</u>
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24

25	4 Sept 77	Andre Clavel	NOT GIVEN
26	5 Sept 77	Andre Clavel	NOT GIVEN
27	6 Sept 77	Andre Clavel	NOT GIVEN
28	7 Sept 77	Andre Clavel	NOT GIVEN

1	8 Sept 77	Andre Clavel	NOT GIVEN
2	10 Sept 77	Andre Clavel	NOT GIVEN
3	9 Sept 77	Andre Clavel	NOT GIVEN
4	12 Sept 77	Andre Clavel	NOT GIVEN
5	13 Sept 77	Andre Clavel	NOT GIVEN
6	14 Sept 77	Andre Clavel	NOT GIVEN
7	16 Sept 77	Andre Clavel	NOT GIVEN
8	17 Sept 77	Andre Clavel	NOT GIVEN

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10 FOLDER #22

11	DATE	MINISTER	LOCATION
12	_____	_____	_____

13	18 Sept 77	Andre Clavel	Clearwater
14	19 Sept 77	Andre Clavel	Clearwater
15	20 Sept 77	Andre Clavel	Clearwater
16	21 Sept 77	Andre Clavel	NOT GIVEN
17	22 Sept 77	Andre Clavel	NOT GIVEN
18	22 Sept 77	Andre Clavel	NOT GIVEN
19	27 Sept 77	Andre Clavel	Clearwater
20	28 Sept 77	Andre Clavel	Clearwater
21	29 Sept 77	Andre Clavel	Clearwater

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1 FOLDER #23

2	<u>DATE</u>	<u>MINISTER</u>	<u>LOCATION</u>
3			
4	15 Oct 77	Andre Clavel	Clearwater
5	14 Oct 77	Andre Clavel	Clearwater
6	13 Oct 77	Andre Clavel	Clearwater
7	12 Oct 77	Andre Clavel	Clearwater
8	30 Sept 77	Andre Clavel	NOT GIVEN
9	11 Oct 77	Andre Clavel	Clearwater
10	10 Oct 77	Andre Clavel	Clearwater
11	9 Oct 77	Andre Clavel	Clearwater
12	7 Oct 77	Andre Clavel	Clearwater
13	5 Oct 77	Andre Clavel	Clearwater
14	4 Oct 77	Andre Clavel	NOT GIVEN
15	3 Oct 77	Andre Clavel	Clearwater
16	2 Oct 77	Andre Clavel	Clearwater
17	1 Oct 77	Andre Clavel	Clearwater
18	30 Sept 77	Andre Clavel	Clearwater

19 FOLDER #24

20	<u>DATE</u>	<u>MINISTER</u>	<u>LOCATION</u>
21			
22			
23	16 Oct 77	Andre Clavel	Clearwater
24	17 Oct 77	Andre Clavel	Clearwater
25	18 Oct 77	Andre Clavel	Clearwater
26	20 Oct 77	Andre Clavel	Clearwater
27	19 Oct 77	Andre Clavel	Clearwater

1	8 Jun 77	Kroeitz	NOT GIVEN
2	21 Oct 77	Andre Clavel	Clearwater
3	23 Oct 77	Andre Clavel	Clearwater
4	24 Oct 77	Andre Clavel	Clearwater
5	25 Oct 77	Andre Clavel	Clearwater
6	26 Oct 77	Andre Clavel	Clearwater
7	22 Oct 77	Andre Clavel	Clearwater

8 FOLDER #25

9	DATE	MINISTER	LOCATION
10	_____	_____	_____
11	27 Oct 77	Andre Clavel	Clearwater
12	29 Oct 77	Andre Clavel	NOT GIVEN
13	30 Oct 77	Andre Clavel	Clearwater
14	31 Oct 77	Andre Clavel	NOT GIVEN
15	2 Nov	D of P	NOT GIVEN
16	1 Nov 77	Andre Clavel	Clearwater
17	2 Nov 77	Andre Clavel	NOT GIVEN
18	4 Nov 77	Andre Clavel	Clearwater
19	22 Nov 77	Andre Clavel	Clearwater
20	22 Nov 77	Andre Clavel	Clearwater
21	19 Nov 77	Andre Clavel	Clearwater
22	19 Nov 77	Andre Clavel	Clearwater
23	18 Nov 77	Andre Clavel	Clearwater
24	4 Nov 77	Andre Clavel	Clearwater
25	17 Nov 77	Andre Clavel	Clearwater
26	4 Jan 78	Rich Cohen	NOT GIVEN
27	24 Mar 78	Chuck Holloway	NOT GIVEN

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1	25 Mar 78	Chuck Holloway	NOT GIVEN
2	25 Apr 78	Lyman Spurlock	NOT GIVEN
3	3 May 78	NOT GIVEN	NOT GIVEN
4	7 May 77	NOT GIVEN	NOT GIVEN
5	18 Apr 78	Lyman Spurlock	NOT GIVEN
6	17 Apr 78	Lyman Spurlock	NOT GIVEN
7	25 Mar 78	Chuck Holloway	NOT GIVEN
8	31 Mar 78	Gary Prss	NOT GIVEN
9	7 Jun 78	Lyman	NOT GIVEN
10	12 Jun 78	Dennis Feevery	NOT GIVEN
11	18 Jun 78	Dennis Feevery	NOT GIVEN
12	16 July 78	Dan Koon	NOT GIVEN
13	19 July 78	Dan Koon	NOT GIVEN
14	19 July 78	Dan Koon	NOT GIVEN
15	20 July 78	Dan Koon	NOT GIVEN
16	20 July 78	Dan Koon	NOT GIVEN

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